

## **RULE CV-33. INTERROGATORIES TO PARTIES**

(a) All answers to interrogatories must be signed under oath by the party to whom they are directed. If circumstances prevent a party from signing the answers, the party's attorney may serve the answers without the party's signature with a statement that properly executed answers will be served on the requesting party not later than 21 days after serving the unexecuted answers. This time may be extended by order of the court.

(b) A party that serves written interrogatories under Federal Rule of Civil Procedure 33 may use any of the following approved interrogatories. The court will not consider objections to these interrogatories, except upon a showing of exceptional circumstances. Each approved interrogatory counts as one question. Other interrogatories are counted in accordance with Federal Rule of Civil Procedure 33(a).

(1) Identify all persons who you believe have knowledge of relevant facts and identify the issues upon which you believe they have knowledge.

(2) Identify all persons or legal entities who have a subrogation interest in the cause of action set forth in your complaint [or counterclaim], and state the basis and extent of said interest.

(3) If [name of party to whom the interrogatory is directed] is a partner, a partnership, or a subsidiary or affiliate of a publicly owned corporation that has a financial interest in the outcome of this lawsuit, list the identity of the parent corporation, affiliate, partner, or partnership and the relationship between it and [the named party]. If there is a publicly owned corporation or a holding company not a party to the case that has a financial interest in the outcome, list the identity of such corporation and the nature of the financial interest.

(4) If the defendant is improperly identified, give its proper identification and state whether you will accept service of an amended summons and complaint reflecting the information furnished by you in answer hereto.

(5) If you contend that some other person or legal entity is, in whole or in part, liable to [the plaintiff or defendant] in this matter, identify that person or legal entity and describe in detail the basis of said liability.